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Attorney for CITIFINANCIAL MORTGAGE COMPANY, INC.

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:	§	CASE NO. 04-42129-H2-13
	§	
JOHN CLAYTON BROWN AND LINDA	§	CHAPTER 13
MARIE BROWN	§	
Debtors	§	
	§	

**RESPONSE OF CITIFINANCIAL MORTGAGE COMPANY, INC.  
TO DEBTORS' OBJECTION TO PROOF OF CLAIM**

TO THE HONORABLE BANKRUPTCY JUDGE WESLEY W STEEN:

COMES NOW Movant, CITIFINANCIAL MORTGAGE COMPANY, INC., (hereafter "CITIFINANCIAL") a secured creditor in the above referenced Bankruptcy Case and files this its Response in opposition to Debtors' Objection to Proof of Claim (hereafter "Debtors' Objection") and shows the Court as follows:

1. CITIFINANCIAL admits the allegations contained in Paragraph One (1) of Debtors' Objection.
2. CITIFINANCIAL admits the allegations contained in Sentence One (1) of Paragraph Two (2) of Debtors' Objection. However, CITIFINANCIAL denies the remaining allegations contained in this paragraph.
3. CITIFINANCIAL admits the allegations contained in Sentence Two (2) of Paragraph Three (3) of Debtors' Objection.

However, CITIFINANCIAL has insufficient information to either admit or deny the remaining allegations contained in this paragraph.

4. CITIFINANCIAL has insufficient information to either admit or deny the allegations contained in Sentence One (1) of Paragraph Four (4) of Debtors' Objection. CITIFINANCIAL admits the allegations contained in Sentence Two of Paragraph (4) of Debtors' Objection. However, CITIFINANCIAL denies the remaining allegations contained in this paragraph.
5. Sentence One (1) of the paragraph numbered Six (6) of Debtors' Objection sets forth the relief requested and thus, no response is required. CITIFINANCIAL admits the allegations contained in Sentence Two (2) of the paragraph numbered Six (6) of Debtors' Objection. However, CITIFINANCIAL has insufficient information to either admit or deny the remaining allegations contained in this paragraph.

WHEREFORE, PREMISES CONSIDERED, CITIFINANCIAL MORTGAGE COMPANY, INC., prays that this Court deny Debtors' Objection and for any and such further relief to which CITIFINANCIAL MORTGAGE COMPANY, INC. may be justly entitled.

Respectfully submitted,

BARRETT BURKE WILSON CASTLE  
DAFFIN & FRAPPIER, L.L.P.

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ATTORNEYS FOR MOVANT

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Response to Debtors' Objection was served on the date that the Response to Debtors' Objection was electronically filed. Service was accomplished in the manner indicated below:

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/S/ YVONNE KNESEK  
Attorneys for Movant

BY REGULAR FIRST CLASS MAIL, POSTAGE PREPAID:

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